

Item 1 Cover Page

A.

John A. Pieroni

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement
Dated: December 21, 2017

Contact: John A. Pieroni, Chief Compliance Officer
6500 Sheridan Drive, Suite 200
Williamsville, NY 14221
www.wnyasset.com

B.

This Brochure Supplement provides information about John A. Pieroni that supplements the WNY Asset Management, LLC Brochure; you should have received a copy of that Brochure. Please contact John A. Pieroni, Chief Compliance Officer, if you did *not* receive WNY Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about John A. Pieroni is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

John A. Pieroni was born in 1969. Mr. Pieroni graduated from SUNY at Buffalo, School of Architecture & Planning, in 1991, with a degree in Environmental Design. Mr. Pieroni has served as a Senior Wealth Manager and Partner of WNY Asset Management, LLC since July of 2003. He became Managing Partner of WNY Asset Management, LLC in January of 2013. Mr. Pieroni has also been associated as a registered representative with Cadaret, Grant & Co. since January 2001.

John A. Pieroni has been a CERTIFIED FINANCIAL PLANNER™ since May 2003. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of

other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must currently satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of Cadaret** Mr. Pieroni is a registered representative of Cadaret, Grant & Co. (“*Cadaret*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Pieroni in his individual capacity as a registered representative of *Cadaret*, to implement investment recommendations on a commission basis.
1. **Conflict of Interest** The recommendation by Mr. Pieroni that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Pieroni. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, John A. Pieroni, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
 2. **Commissions** In the event the client chooses to purchase investment products through *Cadaret*, brokerage commissions will be charged by *Cadaret* to effect securities transactions, a portion of which commissions shall be paid by *Cadaret* to Mr. Pieroni. The brokerage commissions charged by *Cadaret* may be higher or lower than those charged by other broker-dealers. In addition, *Cadaret*, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Pieroni is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.
- B. **Licensed Insurance Agents**. Mr. Pieroni, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Pieroni to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Pieroni that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any insurance commission products from Mr. Pieroni. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant’s Chief Compliance Officer, John A. Pieroni, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, John A. Pieroni, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Pieroni at (716) 626-0060.

Item 1 Cover Page

A.

Robert A. Castiglione

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement
Dated: October 31, 2017

Contact: John A. Pieroni, Chief Compliance Officer
6500 Sheridan Drive, Suite 200
Williamsville, NY 14221
www.wnyasset.com

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This Brochure Supplement provides information about Robert A. Castiglione that supplements the WNY Asset Management, LLC Brochure; you should have received a copy of that Brochure. Please contact John A. Pieroni, Chief Compliance Officer, if you did *not* receive WNY Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Robert A. Castiglione is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Robert A. Castiglione was born in 1975. Mr. Castiglione graduated from Canisius College in 1997 with a degree in Finance, and from Boston College in 2002 with a Masters in Business Administration degree. Mr. Castiglione has served as a Senior Wealth Manager and a Registered Principal of WNY Asset Management, LLC since February of 2004. He became a Partner in January of 2007. Mr. Castiglione has also been associated as a registered representative with Cadaret, Grant & Co. since February 2004.

Robert Castiglione has been a CERTIFIED FINANCIAL PLANNER™ since May 2006. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

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Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of Cadaret** Mr. Castiglione is a registered representative of Cadaret, Grant & Co. ("Cadaret"), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Castiglione in his individual capacity as a registered representative of *Cadaret*, to implement investment recommendations on a commission basis.
1. **Conflict of Interest** The recommendation by Mr. Castiglione that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Mr. Castiglione. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant's Chief Compliance Officer, John A. Pieroni, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
 2. **Commissions** In the event the client chooses to purchase investment products through *Cadaret*, brokerage commissions will be charged by *Cadaret* to effect securities transactions, a portion of which commissions shall be paid by *Cadaret* to Mr. Castiglione. The brokerage commissions charged by *Cadaret* may be higher or lower than those charged by other broker-dealers. In addition, *Cadaret*, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Castiglione is separate and apart from Registrant's investment management services discussed in the Registrant's *Brochure*.
- B. **Licensed Insurance Agents.** Mr. Castiglione, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Castiglione to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Castiglione that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Castiglione. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, John A. Pieroni, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

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Item 1 Cover Page

A.

Ronald M. Lojaco

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement
Dated: October 31, 2017

Contact: John A. Pieroni, Chief Compliance Officer
6500 Sheridan Drive, Suite 200
Williamsville, NY 14221
www.wnyasset.com

B.

This Brochure Supplement provides information about Ronald M. Lojaco that supplements the WNY Asset Management, LLC Brochure; you should have received a copy of that Brochure. Please contact John A. Pieroni, Chief Compliance Officer, if you did *not* receive WNY Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Ronald M. Lojaco is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Ronald M. Lojaco was born in 1967. Mr. Lojaco graduated from Medaille College in 1990 with a degree in Business Administration. Mr. Lojaco has been employed as Senior Wealth Manager of WNY Asset Management, LLC since August of 2005. He became a Partner in May of 2011. Mr. Lojaco has also been associated as a registered representative with Cadaret, Grant & Co. since August 2005.

Ronald M. Lojaco has been a CERTIFIED FINANCIAL PLANNER™ since January of 2003. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

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Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

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 2. **Commissions** In the event the client chooses to purchase investment products through *Cadaret*, brokerage commissions will be charged by *Cadaret* to effect securities transactions, a portion of which commissions shall be paid by *Cadaret* to Mr. Lojacono. The brokerage commissions charged by *Cadaret* may be higher or lower than those charged by other broker-dealers. In addition, *Cadaret*, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Lojacono is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.
- B. **Licensed Insurance Agent**. Mr. Lojacono, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Lojacono to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Mr. Lojacono that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any insurance commission products from Mr. Lojacono. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant’s Chief Compliance Officer, John A. Pieroni, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

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Item 1 Cover Page

A.

Eugene P. O'Connor, Jr.

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement
Dated: October 31, 2017

Contact: John A. Pieroni, Chief Compliance Officer
6500 Sheridan Drive, Suite 200
Williamsville, NY 14221

B.

This Brochure Supplement provides information about Eugene P. O'Connor, Jr. that supplements the WNY Asset Management, LLC, Brochure; you should have received a copy of that Brochure. Please contact John A. Pieroni, Chief Compliance Officer, if you did *not* receive WNY Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Eugene P. O'Connor, Jr. is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Eugene P. O'Connor, Jr. was born in 1963. Mr. O'Connor graduated from Notre Dame in 1987 with a Bachelor of Arts degree in History. Since June of 2012, Mr. O'Connor has been a Senior Wealth Manager at WNY Asset Management, LLC and a registered representative at Cadaret, Grant & Co. From May of 2004 to June of 2012, Mr. O'Connor was a financial adviser at Merrill Lynch.

Eugene P. O'Connor, Jr. has been a CERTIFIED FINANCIAL PLANNER™ since February of 2015. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

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Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

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A.

Evan S. Wardner

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement
Dated: October 31, 2017

Contact: John A. Pieroni, Chief Compliance Officer
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Additional information about Evan S. Wardner is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Evan S. Wardner was born in 1956. Mr. Wardner graduated from SUNY at Buffalo in 1981 with a Bachelor of Science (BS) in Chemistry, and in 1983 with a Masters of Business Administration (MBA) with a concentration in Financial Planning and Control. Since May of 2013, Mr. Wardner has been a Senior Wealth Manager at WNY Asset Management, LLC, and a registered representative at Cadaret, Grant & Co. From February of 2012 to May of 2013, Mr. Wardner was an Energy Consultant with Energy Solutions USA, LLC. From September of 2012 to May of 2013, Mr. Wardner was a professor at Niagara University. From August of 1998 to September of 2012, Mr. Wardner was a registered representative with Linsco/Private Ledger Corp. From October of 2006 to December of 2011, Mr. Wardner was Director of CFP Board-Registered Degree and Certificate Programs at Bryant & Stratton College.

Mr. Wardner has been a CERTIFIED FINANCIAL PLANNER™ since July of 1989. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the

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- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of Cadaret** Mr. Wardner is a registered representative of Cadaret, Grant & Co. (“*Cadaret*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Wardner in his individual capacity as a registered representative of *Cadaret*, to implement investment recommendations on a commission basis.
1. **Conflict of Interest** The recommendation by Mr. Wardner that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Mr. Wardner. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant's Chief Compliance Officer, John A. Pieroni, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
 2. **Commissions** In the event the client chooses to purchase investment products through *Cadaret*, brokerage commissions will be charged by *Cadaret* to effect securities transactions, a portion of which commissions shall be paid by *Cadaret* to Mr. Wardner. The brokerage commissions charged by *Cadaret* may be higher or lower than those charged by other broker-dealers. In addition, *Cadaret*, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Wardner is separate and apart from Registrant's investment management services discussed in the Registrant's *Brochure*.
- B. **Licensed Insurance Agent**. Mr. Wardner, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Wardner to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Mr. Wardner that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Wardner. Clients are reminded that they may purchase insurance products recommended by Mr. Wardner through other, non-affiliated insurance agents. **The Registrant's Chief Compliance**

Officer, John A. Pieroni, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, John A. Pieroni, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Pieroni at (716) 626-0060.

Item 1 Cover Page

A.

David Daniel Jarosz

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement
Dated: May 15, 2020

Contact: John A. Pieroni, Chief Compliance Officer
6500 Sheridan Drive, Suite 200
Williamsville, NY 14221
www.wnyasset.com

B.

This Brochure Supplement provides information about David Daniel Jarosz that supplements the WNY Asset Management, LLC Brochure; you should have received a copy of that Brochure. Please contact John A. Pieroni, Chief Compliance Officer, if you did *not* receive WNY Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about David Daniel Jarosz is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

David Daniel Jarosz was born in 1966. Mr. Jarosz has not received any higher education degrees after high school. Mr. Jarosz has been an Investment Advisor Representative of WNY Asset Management, LLC since October 2017.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

David Daniel Jarosz is a registered representative. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. WNY Asset Management, LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services any representative of WNY Asset Management, LLC in such individual's outside capacity.

David Daniel Jarosz is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. WNY Asset Management, LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of WNY Asset Management, LLC in their capacity as a licensed insurance agent.

Item 5 Additional Compensation

David Daniel Jarosz does not receive any economic benefit from any person, company, or organization, other than WNY Asset Management, LLC in exchange for providing clients advisory services through WNY Asset Management, LLC.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, John A. Pieroni, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Pieroni at (716) 626-0060.

Item 1 Cover Page

A.

Debra A. Brown

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement

Dated: October 31, 2017

Contact: John A. Pieroni, Chief Compliance Officer
6500 Sheridan Drive, Suite 200
Williamsville, NY 14221
www.wnyasset.com

B.

This Brochure Supplement provides information about Debra A. Brown that supplements the WNY Asset Management, LLC Brochure; you should have received a copy of that Brochure. Please contact John A. Pieroni, Chief Compliance Officer, if you did *not* receive WNY Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Debra A. Brown is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Debra A. Brown was born in 1991. Mrs. Brown graduated from Niagara University in 2012 with a Bachelor of Science degree in Management, and in 2014 with a Master of Business Administration degree in Finance. Mrs. Brown has been a Wealth Manager of WNY Asset Management, LLC since January 2015. From August 2014 to December 2014, Mrs. Brown was a Paraplanner with WNY Asset Management, LLC. Mrs. Brown has also been a registered representative of Cadaret, Grant & Co. since August 2014. From December of 2013 to June of 2014, Mrs. Brown was a registered representative of First Investors Corporation. From July of 2009 to August of 2014, Mrs. Brown was a graduate staff assistant at Niagara University.

Mrs. Brown has been a CERTIFIED FINANCIAL PLANNER™ since September 2016. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must currently satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of*

Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

A. **Registered Representative of Cadaret** Mrs. Brown is a registered representative of Cadaret, Grant & Co. (“*Cadaret*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mrs. Brown in her individual capacity as a registered representative of *Cadaret*, to implement investment recommendations on a commission basis.

1. **Conflict of Interest** The recommendation by Mrs. Brown that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mrs. Brown. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, John A. Pieroni, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
2. **Commissions** In the event the client chooses to purchase investment products through *Cadaret*, brokerage commissions will be charged by *Cadaret* to effect securities transactions, a portion of which commissions shall be paid by *Cadaret* to Mrs. Brown. The brokerage commissions charged by *Cadaret* may be higher or lower than those charged by other broker-dealers. In addition, *Cadaret*, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the

period that the client maintains the mutual fund investment. The securities commission business conducted by Mrs. Brown is separate and apart from Registrant's investment management services discussed in the Registrant's *Brochure*.

- B. **Licensed Insurance Agents.** Mrs. Brown, in her individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mrs. Brown to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mrs. Brown that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mrs. Brown. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, John A. Pieroni, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

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